

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE:

## GENERAL MOTORS LLC IGNITION SWITCH LITIGATION

*This Document Relates To All Actions*

JESSE M. FURMAN, United States District Judge:

On September 4, 2015, the Court received the email attached here as Exhibit 1, requesting leave to include a redacted exhibit in non-party King & Spalding's Sur-Reply to Plaintiff's Motion to Compel Production of Documents from New GM and King & Spalding Based on the Crime Fraud Exception. (See Docket No. 1341). In accordance with Paragraph 6(B) of the Court's Individual Rules and Practices and MDL Order Nos. 10 and 77, King & Spalding is hereby ORDERED to file on ECF an appropriate motion to seal the redacted material by **Monday, September 14, 2015**.

SO ORDERED.

Dated: September 10, 2015  
New York, New York

  
JESSE M. FURMAN  
United States District Judge

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 09/10/2015

14-MD-2543 (JMF)

ORDER

# **Exhibit 1**



In Re: General Motors LLC Ignition Switch Litigation, MDL NO. 2543, Master File No.: 14-MDL-2543 (JMF) - King & Spalding's Sur-Reply Document No. 1341-4  
Christopher Greer  
to:

Furman\_NYSDChambers@nysd.uscourts.gov

09/04/2015 11:46 PM

Hide Details

From: Christopher Greer <Cgreer@parkjensen.com>

To: "Furman\_NYSDChambers@nysd.uscourts.gov"  
<Furman\_NYSDChambers@nysd.uscourts.gov>

1 Attachment



Exhibit C - DeGiorgio Dep - UNREDACTED.pdf

Dear Judge Furman,

Pursuant to Your Honor's Individual Rules and Practices 6(B) non-party King & Spalding LLP ("K&S") seeks leave to file Exhibit C (Document No. 1341-4) to King & Spalding's Sur-Reply to Plaintiff's Motion to Compel Production of Documents from New GM and King & Spalding Based on the Crime Fraud Exception in redacted form. Exhibit C is an excerpt of the Raymond DeGiorgio Deposition Transcript from the deposition dated June 18, 2015. We have filed a redacted version of Exhibit C. Attached is an unredacted version of Exhibit C which we respectfully request to maintain under seal.

We have been informed that the parties have identified portions of the DeGiorgio deposition transcript, including Lines 4 through 23 on page 431, as Highly Confidential material. Accordingly, we have redacted those portions of the transcript. The other redactions reflect information that we did not intend to excerpt in the Exhibit, but which appeared alongside information we cited in our Sur-Reply. Those redactions should be read as omitted pages we did not intend to excerpt in our submission.

Respectfully Submitted,

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